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November 13, 2001

Dr. Bill Stokes, Director
NTP Interagency Center for the Evaluation of Alternative
Toxicological Methods (MD EC-17)
National Institute of Environmental Health Sciences
P.O. Box 12233
Research Triangle Park, NC 27709

SUBMITTED ELECTRONICALLY TO: niceatm@niehs.nih.gov

Dear Dr. Stokes:

We are pleased to submit these comments on the National Institute of Environmental Health Sciences (NIEHS) Report of the International Workshop on *In Vitro* Methods for Assessing Acute Systemic Toxicity. They are submitted on behalf of the 5,000 physician and 100,000 layperson members of the Physicians Committee for Responsible Medicine, a nonprofit organization dedicated to promoting higher ethical standards in medical and scientific research.

We fully support the comments submitted by People for the Ethical Treatment of Animals (PETA) on November 13, 2001. In particular, we agree with the comments of PETA and other animal protection organizations that not enough effort has been spent on developing the cytotoxicity tests as a replacement method for the *in vivo* acute toxicity tests.

We urge the NIEHS to develop a framework for the collection of data from the *in vitro* cytotoxicity assays used in starting dose calculations so that this information can immediately be used to validate the test series as a replacement method.

Thank you for the opportunity to comment. I can be reached at 202-686-2210, ext. 302, or via e-mail at ncardello@pcrm.org. Correspondence should be sent to my attention at PCRM, 5100 Wisconsin Ave., N.W., Suite 400, Washington, DC 20016. I look forward to discussing these important issues with you.

Sincerely,

Nicole Cardello, M.H.S.
Staff Scientist